

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF MASSACHUSETTS

DORAN LRYEN, Pro Se,
Plaintiff,

E. A. NO. _____

v.

ANDREA CABRAWL, et al.

Defendants.

04-10033 REK

This is a civil rights action filed by Doran Lryen, a Suffolk House of Correction inmate for damages and injunctive relief under 42 U.S.C. § 1983, alleging unjustifiable denial of Jail Credit and Harassment with inmates in violation of the Eighth Amendment to the United States Constitution and denial of Jail Credit in violation of the Due process clause of the Fourteenth Amendment to the Constitution.

Jurisdiction

1. The Court has Jurisdiction over this civil rights action and violation of Federal Constitutional rights under 42 U.S.C. §§ 1981(a) and 1983.
2. The Court has Supplemental Jurisdiction over the state law claims brought under 28 U.S.C. § 1631.

SCANNED

DATE: 11/04

BY: JOM

Parties

3. The Plaintiff, whose name is generally concealed as The Plaintiff, is a member of the United States Army. The name is disclosed in this Complaint.
4. The Plaintiff, Andrew Buchanan, is the Sheriff of the Suffolk County House of Correction, and is generally responsible for supervising and administrative decisions of the institution. He is a member of the Suffolk County House of Correction. He is also a member of the Suffolk County House of Correction. He is also a member of the Suffolk County House of Correction.
5. Defendant, Mary McCarroll, is the Deputy Superintendent of the Suffolk County House of Correction, and is generally responsible for supervising and administrative decisions of the institution. She is also a member of the Suffolk County House of Correction.
6. Defendant, Thomas Lynch, and David McBurney are employed by the Suffolk County House of Correction Administration. They are responsible for supervising the Institutional Training and Correction Department. They are also a member of the Suffolk County House of Correction.
7. All the Defendants have acted, and continue to act, under ~~Section 87(2)(b)~~ Section 87(2)(b) at all times relevant to this Complaint.

FACTS

8. On June 3, 2003, The plaintiff PP were incarcerated at The Suffolk County Jail (Norfolk Jail) awaiting Trial in District District Court on a Violation matter.

9. On July 15, 2003, The plaintiff PP received a (15) month Sentence and was transported from District Court to the Suffolk House of Correction and was given Forty Days Jail Credit For The Time he was awaiting Trial at The Norfolk County Jail.

10. On July 16, 2003, The plaintiff PP received an institutional Package consisting of The rules and regulations of The Jail and the plaintiff PP provide eligibility date and was assigned to Block 2, 2003.

11. On September 2, 2003, The plaintiff PP directed a correspondence of Letter Paper to the attention of all defendants, saying they were investigating his release. Wrap update because it was inaccurate and that he did not get 40 days Jail credit and that if the defendants had implemented The plaintiff PP's Forty days Jail credit, they would have been out in August of 2003, but at June 19, of 2004 because The plaintiff PP is serving a (15) month Sentence in prison from June 3, of 2003 until August 25, of 2004, is (15) Months. It was evident That The plaintiff PP now was credited his 40 days Jail Credit.

12. The plaintiff PP received a Letter Paper dated 1-1-04.

13. Mr. Thomas Leggett was the author of the correspondence, in charge of The housing and inmate Jail credit and was given the date of December 1, 2003, from inmate from The plaintiff PP that refers to the information.

13. These motions have passed from the jurisdiction of Plaintiff's Parish Attorney to the District Court regarding Plaintiff's attorneys, in order that the Plaintiff be able to get the necessary legal assistance to complete the Complaint.

CLAIMS FOR RELIEF

14. The Parish of defendants Eubank, Marshfield, McDavid and Lyons, to immediately respond to the plaintiff's Motion of Complaints and refusal to correct his negligence and failure to implement the plaintiff's 60 days Jail Credit ordered by a Judge, constituted deliberate indifference and further denied the plaintiff the Due process of Law in violation of the Fourteenth Amendment to the United States Constitution.

15. The actions of defendants Lyons and McDavid, in refusing to turn the known the mistake in the plaintiff's failure to pay on his, constituted deliberate indifference, and supported that he was on some help because the court described violation of Eighth Amendment rights and interfering in plaintiff's motion from corrections.

Relief requested

wherefore, Plaintiff requests that the court grant the following relief:

A. Enter a declaratory judgment finding that:

1. The Parish of Louisiana failed to take action to curb the known violations of plaintiff's rights under the Eighth Amendment to the United States Constitution and constituted procedural violations under State Law.

2. Underhandedly Manufacturing Evidence for Infringement: The plaintiff's failure to file a Complaint of his IP did not merely leave a discrepancy, and further, the circumstantial evidence to point upon the plaintiff through recklessness disregard of plaintiff's due process rights protected under law and the United States Constitution, violated the plaintiff's Fourteenth Amendment to the United States Constitution.

3. Defendant's liquidation is contrary to the intent of The Tax Court's decision in plaintiff's favor, and has the plaintiff's rights under The due process clause of the Fourteenth Amendment to the United States Constitution.

4. In 1964, the Council of Ministers of the European Community decided to begin negotiations of a protocol with the United States providing for reciprocal rights, privileges and freedom of movement for the United States citizens in the Community.

B. I am not a member of any of the above Councils,
 Meetings or their agents but:

4. Simultaneously Implement the
Government's Revised Policy regarding the Willingly
Transfer and Resettlement of the Government's
Chinese Refugees.

It is a 12.5 percent increase in the following year (1991-1992) of \$31,600. Finally, and based on a similar definition for California, Marston, by 1992, also has three, but the number has increased to 107 years (increased on a number of the independent factors to properly place people in the 100-125 range).

2. \$ 10,000 each against defendants Lyons and Mc David for the punishment and emotional distress resulting from their denial of any process in connection with the plaintiff's earned jail credit.

D. Actual Punitive damages in the following amounts:

1. \$ 20,000 each against defendants Cabrawi and Mastromilli, Lyons and Mc David;

2. \$ 10,000 each against defendants Lyons and Mc David;

3. \$ 20,000 each against defendants Cabrawi and Mastromilli;

E. Grant such other relief as it may appear the plaintiff is entitled.

Respectfully Submitted,
Mr. Dana John Pro Se

Mr. Dana John (Pro Se)

26-Broadway St.

Boston, MA 02108

Dated 12-1-03